

## REMARKS

Claims 1-15 are pending in this application, stand rejected, and are at issue herein. Reconsideration of claims 1-15 in view of the following remarks and indication of the allowability thereof at an early date are respectfully solicited.

The Applicants gratefully acknowledge the removal of the objection to the drawings.

The Applicants also gratefully acknowledge the removal of the objection to the Specification.

Additionally, the Applicants gratefully acknowledge the removal of the objection to claims 10 and 12.

The Examiner has rejected claims 1-15 under 35 U.S.C. § 102(b) as being anticipated by WO 98/41934, published 24 September 1998, to Rowe et al. The Applicants have thoroughly examined the Rowe et al. publication and the rationale for its application to claims 1-15, but must respectfully traverse this ground of rejection for the reasons set forth below.

Reconsideration of this ground of rejection and indication of the allowability of claims 1-15 at an early date are respectfully solicited.

Independent claim 1 is directed to a method of modifying "a display order of user interface (UI) screens" for a suite installation and setup application. This method includes the steps of providing a text based setup data file having at least one section containing "a display order textual listing of the UI screens", providing a text editor, and editing "the display order textual listing of the UI screens" in the setup data file using the text editor. As is apparent from this independent claim 1, only the display order listing is modified, not the content of any of the UI screens to which the textual listing refers. "In this way, the order may be changed by simply using a text editor to rearrange the order, add to or delete items from the list specified therein." Replacement Specification, paragraph [0010] (emphasis added).

The Applicants recognize that some setup applications "allow a setup owner to modify templated pages". Replacement Specification, paragraph [0006]. Further, "if the re-ordering of the pages were desired, prior systems required that a significant amount of code would either have to be changed or rewritten to work with the new ordering of pages. Also a lot of testing would be needed to make sure no code was relying on another execution path being run before." *Id.* However, it is this modification to templated pages to which the system of Rowe et al. is directed.

Specifically, the system of the Rowe et al. publication is a database and content management tool. Rowe et al., Abstract. This content management tool enables end users to "update records and create links between unique identifiers (items) and shared data (feature type, supplier, media for example)." *Id.* The context for the system of Rowe et al. is the generation of web pages to be viewed by an end user via the Internet or intranet. Rowe et al. identifies a problem relating to the storage and updating of the various web pages that are downloaded to an end user's computer for browsing. Specifically, Rowe et al. identifies that the current arrangement of storing all of the individual web pages that may be accessed by a user is "costly in terms of storage space and can make file management difficult particularly if some changes are required to save the common text 27 such that all of the pages stored require independent individual editing in the appropriate file server." Rowe et al., page 5, lines 6-9.

To overcome this problem of having to store this plurality of individual web pages on a file server, and having to modify numerous individual web pages when commonly shared text or graphics are modified, Rowe provides "a master storage system 8 which is a large database, for example a relational database," *Id.* at lines 10-11. This master storage system then individually creates the web page requested by the user "when application is made for downloading of one or more pages from the storage system", that is "at the time of application whether the application is from an Internet or intranet terminal or for multi-media or interactive television purposes." *Id.* at lines 21-25. "To enable this to occur, rather than creating a complete page to be stored, the service owner creates a template and a list of information or content to be included in the template." *Id.* at lines 26-28.

As will be apparent from the above-quoted sections to those skilled in the art, there can be no "display order textual listing of the UI screens" because the UI screens of Rowe et al. are individually created at the time a user selects particular information for downloading by pointing its "cursor to a link button such that the browser program causes a message to be transmitted comprising the link address to fetch down additional appropriate information pages from a file server." Rowe et al., page 4, lines 29-31. Since the generation and display of the screens of Rowe et al. are based upon individual user selection at the time of web browsing, the Applicants respectfully submit that it cannot be said that Rowe et al. teaches the provision of a text-based set up data file having at least one section containing a display order textual listing of the UI screens as required by independent claim 1.

This total lack of teaching of a setup database file having a display order textual listing of the UI screens is not surprising since the problem to which the Rowe et al. publication is directed

is completely foreign to the problem addressed by the system of the present invention. That is, the method of the present invention is directed to modifying the display order of user interface screens for a suite installation and setup application, as opposed to the problem of storing multiple web pages on a file server for access by browsers who may want to view this information.

Independent claim 1 also requires the step of editing "the display order textual listing of the UI screens" in the setup data file using a text editor. The Applicants once again state that this step is directed at editing only the display order, and not the actual content of the individual UI screen. The system described in the Rowe et al. publication, however, is directed specifically at editing the content of pages to be created if an end user requests a different web page. This process "for creating a web page" (Rowe et al., page 11, lines 28-31) allows a user of the system of Rowe et al. to include various pieces of information, graphics, and links "such that the web end user can click on a link to be connected automatically to a subsequent page." Rowe et al., page 14, lines 29-31. That is, the tool of Rowe et al. "will enable the data to be used in a logical manner to provide, for example, HTML pages for access by end users." Rowe et al., page 21, lines 30-33. While such a system may be valuable in the creation of individual web pages without having the requisite problem of storage space on the file server, such a system has nothing to do with the display order for a suite installation and setup application, or to the provision and editing of such display order textual listing in a text-based set up data file.

However, Rowe et al. does describe that various UI screens are displayed in a particular order beginning on page 22, line 7. Specifically, this text describes that when the content management program is activated, "a screen (Figure 15) is presented to the viewer." If the user name and password are properly entered, the system "will step to an opening screen (Figure 16) which is the background window for all subsequent parts of the program." *Id* at lines 11-16. "Initially the Figure 16 screen is overlaid by an identity screen (Figure 17) which indicates the program and operation and may provide other information to the user." *Id* at lines 30-33. Once the user requests that a file be opened, "Figure 16 is cleared and the screen is overlaid with a further user identity and password screen (Figure 18)." Rowe et al., page 23, lines 5-6. If the user enters the correct information, a pause screen (Figure 19) is displayed." *Id* at lines 16-17.

While the system of Rowe does utilize a particular display order of UI screens when someone is utilizing the content management tool, there is no description of any capability to edit or vary in any way this display order whatsoever. Indeed, this display order of UI screens

appears to be fixed by the programming of Rowe et al. when the content management tool is being used to "edit the content of the records." Rowe et al., page 24, lines 22-26.

Independent claim 1 also requires the step of "providing a text editor." However, the Examiner does not point to any teaching in Rowe et al. of the provision of a text editor. Instead, the Examiner misquotes Rowe et al. as follows: "...the user now has the option of ....adding a new item type to the list (text edit)..." However, an analysis of the Rowe et al. publication reveals that the phrase "(text edit)" does not appear whatsoever in the Rowe et al. publication. Indeed, the Applicants respectfully submit that it is mis-descriptive of the database and content management tool of Rowe et al. to classify it as a "text editor". Furthermore, it is unclear whether the database and content management tool of Rowe et al. could be used for editing a text-based setup data file whatsoever.

Further, while the user points to page 24, lines 22-26 for description of the user's ability to edit "the content of the records" the Examiner fails to note the remainder of that sentence wherein it is required that such editing is carried out "by making entries to the various fields (620) [of Figure 40b]...". The Applicants respectfully submit that the filling in of entries in various fields of the specified window displays while using the database and content management tool does not constitute the provision of a text editor nor editing the display order textual listing of the UI screens in a setup data file using the text editor. Indeed, the fields 620 of Figure 40b are related to feature values, and do not define the display order of UI screens to be displayed for a suite installation and setup application as specifically required by this independent claim 1. Further, the Rowe et al. reference may actually teach away from the editing of a text-based setup data file using a text editor on page 31, lines 27-31 wherein it is stated "it will be appreciated that the MASS 8 may only support certain media format types (such as .GIF, .WAV, .HTML, .PCI for example)..."

In view of the above, the Applicants respectfully submit that the Rowe et al. publication does not anticipate claim 1, nor those claims dependent thereon, because it fails to teach each and every limitation as specifically required by this claim. Therefore, the Applicants respectfully request reconsideration of this ground of rejection and indication of claims 1-8.

Independent claim 9 is directed to a computer-readable medium having stored thereon computer executable components comprising a plurality of components assembled into a suite, and a text based setup database file including a display order textual listing identifying specific user interface (UI) screens to be displayed during installation of the components. However, as discussed above, the system described by the Rowe et al. publication is directed to a database

and content management tool. This content management tool is used to design and vary the actual content of web pages that will be constructed at the time of user request for such information. However, since the content management tool of Rowe et al. cannot dictate what information a user may decide to select at any particular time, it reasonably includes no display order textual listing whatsoever. In fact, the order in which web pages are created and displayed by the system of Rowe et al. is completely up to the whim of each and every end user who access web servers utilizing this system.

Since the system of Rowe et al. does not control, direct, or assist in any way the installation of a suite of components, it is not surprising that it does not describe a text-based setup database file that includes a display order textual listing identifying specific user interface screens to be displayed during installation of the components.

The sections of Rowe et al. cited by the Examiner also fail to teach the requirements of this independent claim 9. Specifically, the first cited section merely describes that "rather than creating a complete page be stored, the service owner creates a template and a list of information or content to be included in the template." However, this cited section does not describe a listing of the display order of UI screens to be displayed during the installation of components, but merely describes the creation of a template for a single page and a list of information or content to be displayed on that single page. The next quoted section merely describes two examples of websites entitled "healthnet" and "shopnet" that may reside on a single web server. However, while each of these two exemplary websites create and display web pages per user requests using the templates and stored common information, this quoted section in no way describes a setup database file including a display order textual listing identifying specific user interface screens to be displayed during installation of the components. As discussed above, the order of the web pages that must be created and downloaded to an end user's computer via the Internet or intranet is governed solely by the whim of the end user. Such a user is freely able to select any desired information in any order, which order is not controlled by the system of Rowe et al. whatsoever.

As such, the Applicants respectfully submit that the Rowe et al. publication does not anticipate independent claim 9 or those claims dependent thereon because it fails to teach each and every limitation as required by these claims. Reconsideration of this ground of rejection and indication of the allowability of claims 9-11 at an early date are therefore respectfully solicited.

Independent claim 12 is directed to a computer-readable medium having stored thereon computer executable instructions for performing the steps of acquiring a textual listing of user interface screens of each of a plurality of applications in a suite that are to be installed, acquiring

the user interface screens identified by the textual listing, and displaying the user interface screens identified by the textual listing for each of the applications in the suite that are to be installed. As discussed at length above, the system of Rowe et al. does not address the installation of a suite of applications whatsoever, but merely describes a system that reduces the storage space required for the generation of a plurality of web pages to be created for viewing on a user's browser once a request for such information has been received. Indeed, the quoted sections of the Rowe et al. publication describe such a web page content generation system, and do not discuss the steps required by claim 12 whatsoever. Specifically, the first quoted section relied upon by the Examiner states that "the system selects from the remote database table 109 a list of item types for display on the view section (612) of the FIG. 39 form." (emphasis added) As is readily apparent from a brief observation of FIG. 39, this is a single data management search criteria window on which an item type may be selected. However, as defined in the Rowe et al. publication, an item simply "define[s] links to stored content for each of the areas of the template." Rowe et al., page 5, lines 29-30. Therefore, displaying a list of items as described in the Rowe et al. publication in no way equates to the acquisition of a textual listing of user interface screens that will be displayed for each of the applications in the suite that are to be installed.

Further, to meet the limitation of acquiring the user interface screens identified by the textual listing, the Examiner cites to page 24, lines 2-3. However, an analysis of this cited section reveals that there is no acquisition of user interface screens identified by a textual listing, but instead that the user is provided with the option of selecting an item type from the list or of adding a new item type to the list. If the user selects an item, screen 40a is displayed, which is an items and associated features screen in which an item name, short name, description, product code, etc., is entered. However, this items and associated features input screen in no way equates to a user interface screen that is displayed for each application in a suite that is to be installed.

Finally, independent claim 12 requires the step of displaying the user interface screens identified by the textual listing for each of the applications in the suite that are to be installed. To meet this limitation, the Examiner points to Figure 4, tools/view load log and to Figure 23 used to populate tables in a particular service. However, the load log of Rowe et al. is not a user interface screen for each of the applications in a suite that are to be installed, but is instead a simple listing provided in the single view load log window of FIG. 23. The load log itself is not a textual listing of user interface screens but is a simple log indicating which file transfers have occurred.

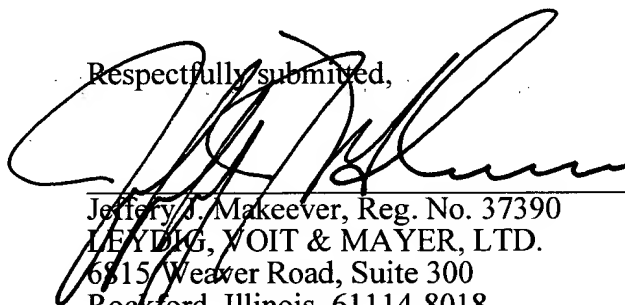
In re Appln. of Jeff Zimmiewicz  
Application No. 09/557,143

In view of the above, the Applicants respectfully submit that the system of the Rowe et al. publication cannot anticipate independent claim 12 and those claims dependent thereon, as it fails to teach each and every limitation specified by these claims. Therefore, reconsideration of this ground of rejection and indication of the allowability of claims 12-15 at an early date are respectfully solicited.

In view of the above the Applicants respectfully submit that claims 1-15 are in condition for allowance. Consideration of claims 1-15 and indication of the allowability thereof at an early date are respectfully solicited.

If the Examiner believes that a telephonic conversation will aid in the resolution of any issues not resolved herein, the Examiner is invited to contact the Applicant's attorney at the telephone number listed below.

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